

JOSHUA A. SLIKER, ESQ.
Nevada Bar No. 12493
JACKSON LEWIS P.C.
300 S. Fourth Street, Suite 900
Las Vegas, Nevada 89101
Telephone: (702) 921-2460
Email: joshua.sliker@jacksonlewis.com

*Attorneys for Defendant
Turner Staffing Group, LLC*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

WADE ALLEN, individually, and on behalf of
all others similarly situated,

Plaintiff,

vs.

BARRICK GOLD OF NORTH AMERICA,
INC. d/b/a NEVADA GOLD MINES LLC; and
TURNER STAFFING GROUP, LLC,

Defendants.

Case No.: 3:24-cv-00231-CLB

**ORDER GRANTING STIPULATION
TO STAY CASE PENDING MOTION
FOR PRELIMINARY APPROVAL OF
SETTLEMENT**

(SECOND REQUEST)

Plaintiff WADE ALLEN (“Plaintiff”), by and through his counsel of record, the law firms of Brown, LLC and Roger Wenthe, PLLC, and Defendant TURNER STAFFING GROUP, LLC (“Turner” or “Defendant”), by and through its counsel of record, the law firm of Jackson Lewis P.C., Defendant NEVADA GOLD MINES LLC (erroneously sued as Barrick Gold of North America, Inc d/b/a Nevada Gold Mines LLC) (“NGM”), by and through their counsel, the law firm of Simons Hall Johnston PC, hereby notify the Court that they have reached a settlement in principle of this action, and stipulate and agree to continue the stay of this case to **June 23, 2025**, pending the filing of a motion for preliminary settlement approval, based on the following:

1. This case is a putative collective action under the Fair Labor Standards Act and putative class action under FRCP 23.

2. On September 13, 2024, the parties submitted a stipulation to stay this case until January 3, 2025, to engage in mediation. ECF No. 19.

3. On September 16, 2024, the Court approved the parties’ stipulation and ordered the

1 case stayed to January 3, 2025. ECF No. 20.

2 4. The parties participated in an initial mediation session with Hon. Peggy A. Leen
3 (Ret.) at JAMS on December 18, 2024, but did not reach a settlement.

4 5. On January 6, 2025, the Court approved the parties' stipulation to continue the stay
5 of this case until March 28, 2025, pending a second mediation session with Judge Leen in mid-to
6 late March 2025. ECF No. 24.

7 6. The parties held the second mediation session on March 6, 2025, and are pleased to
8 report that they have reached a settlement in principle for a collective and class action settlement
9 that will be subject to this Court's preliminary and final approval under Rule 23(e) of the Federal
10 Rules of Civil Procedure.

11 7. On April 22, 2025, the parties filed a Joint Stipulation to Stay Case Pending Motion
12 for Preliminary Settlement Approval seeking to stay the case until May 22, 2025, which the Court
13 granted. ECF Nos. 26 (Stipulation) and 27 (Order).

14 8. The parties have finalized the long-form settlement agreement and exhibits,
15 allocation of settlement funds amongst putative collective and class members, but need additional
16 time to execute the settlement documents and finish preparing the motion for preliminary approval,
17 which they expect to file by June 23, 2025.

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1 9. Accordingly, the parties have stipulated to, and request that this Court issue an order
2 continuing the stay of this case until June 23, 2025.

3 DATED this 22nd day of May, 2025.

4 BROWN, LLC

JACKSON LEWIS P.C.

5 /s/ Nicholas Conlon

/s/ Joshua A. Sliker

6 NICHOLAS CONLON, ESQ.

JOSHUA A. SLIKER, ESQ.

7 *Admitted Pro Hac Vice*

Nevada Bar No. 12493

8 111 Town Square Place, Ste. 400

300 S. Fourth Street, Suite 900

9 Jersey City, New Jersey 07310

Las Vegas, Nevada 89101

10 ROGER WENTHE, ESQ.

Attorneys for Defendant

11 ROGER WENTHE, PLLC

Turner Staffing Group, LLC

12 Nevada Bar No. 8920

SIMONS HALL JOHNSTON PC

13 2831 St. Rose Pkwy., Suite 200

14 Henderson, Nevada 89052

/s/ Anthony L. Hall

15 *Attorneys for Plaintiff*

ANTHONY L. HALL, ESQ.

16 *Wade Allen*

Nevada Bar No. 5977

690 Sierra Rose Dr.

Reno, Nevada 89511

Attorneys for Defendant

Nevada Gold Mines LLC

17 **IT IS SO ORDERED.**

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19 UNITED STATES MAGISTRATE JUDGE

20 DATED: May 23, 2025